



4. On or about September 11, 2018, Respondent registered as a charitable organization with the Department of State, Bureau of Corporations and Charitable Organizations (Bureau) and holds certificate of registration no.: 12765.

5. Respondent remained unregistered from May 16, 2016 through September 10, 2018 while soliciting contributions.

6. During this unregistered period, Respondent received approximately \$1,753,214.00 in contributions.

7. Respondent was not exempt from registration under 10 P.S. § 162.6(a)(8) since Respondent received contributions in excess of \$25,000.00 per annum.

#### **AGREED VIOLATIONS**

8. Respondent admits and agrees that by engaging in the aforementioned activities, Respondent committed violations of the Act as follows:

a. Violating Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), by and through 10 P.S. § 162.5(a), by soliciting contributions without the approved registration filed with the Bureau.

#### **PROPOSED ORDER**

9. The participants, intending to be legally bound, consent to issuance of the following Order in settlement of this matter:

a. Respondent violated Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), by and through 10 P.S. § 162.5(a), by soliciting contributions without the approved registration filed with the Bureau.

### **ADMINISTRATIVE PENALTIES**

8. An **ADMINISTRATIVE FINE** of **Six Thousand Dollars (\$6,000.00)** is levied upon Respondent. Respondent shall tender the full sum of **Six Thousand Dollars (\$6,000.00)**, with this executed Consent Agreement. Payment shall be by certified check, cashier's check, attorney's check, or U.S. Postal money order. The instrument of payment shall be made payable to the "Commonwealth of Pennsylvania," and shall be valid for a period of at least one hundred eighty (180) days. Respondent agrees that payment will be made by one of the methods indicated in subparagraph (a) above and that payment by uncertified personal check, corporate check or cash will not be accepted.

### **CASE SETTLED AND DISCONTINUED**

9. This case shall be deemed settled and discontinued upon the Secretary issuing an Order adopting this Consent Agreement and the Respondent's successful completion of the requirements of this Order. However, nothing in this Consent Agreement and Order shall preclude the Prosecuting Attorney for the Bureau from filing charges or the Secretary from imposing disciplinary or corrective measures for violations or facts not contained in this Consent Agreement and Order.

### **ACKNOWLEDGEMENT OF NOTICE AND WAIVER OF HEARING**

10. Respondent waives the filing of an Order to Show Cause in this matter. Respondent knowingly and voluntarily waives the right to an administrative hearing in this matter, and to the following rights related to the hearing: to be represented by counsel at the hearing; to present witnesses and testimony in defense or in mitigation of any sanction that may be imposed for a violation; to cross-examine witnesses and to challenge evidence presented by the Bureau; to present legal arguments by means of a brief; and to take an appeal from any final adverse decision.

**AGREEMENT NOT BINDING ON OTHER PARTIES**

11. This Consent Agreement is between the Bureau and Respondent only. It does not bind any other administrative or governmental entity of the Commonwealth of Pennsylvania, including any other bureau within the Department of State. Except as otherwise noted, this Agreement is to have no legal effect if (a) the Office of General Counsel expresses an objection to the Agreement's form or legality and/or (b) unless and until the Secretary issues the stipulated Order.

**EFFECT OF SECRETARY'S REJECTION**

15. Should the Secretary not approve this Consent Agreement, presentation to and consideration of this Consent Agreement and other documents and matters by the Secretary shall not prejudice the Secretary from further participation in the adjudication of this matter. This paragraph is binding on the participants even if the Secretary does not approve this Consent Agreement.

**ENTIRE AGREEMENT**

16. This Agreement contains the whole agreement between the parties; provided, however, that the captions printed in the various provisions of this agreement are for ease of reading only and are not to be interpreted as forming any part of this agreement. There are no other terms, obligations, covenants, representations, statements or conditions, or otherwise, of any kind whatsoever, concerning this Agreement.


**AGREEMENT DOES NOT PREVENT REFERRAL TO OTHER AGENCIES**

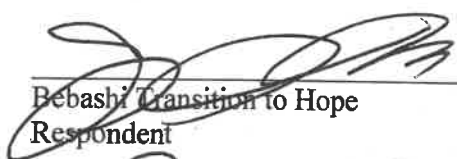
17. The parties acknowledge that other federal, state, and/or local agencies may have jurisdiction over the activities of, or representations made by, Respondent and its officers, directors, agents, employees or independent contractors. Nothing in this Consent Agreement or the Order based upon this Consent Agreement shall preclude representatives of the Bureau from

referring any information or data produced as a result of this matter to any federal, state, or local agency or governmental unit having jurisdiction over the activities of Respondent or any officer, director, agent, employee or independent contractor of the Respondent.

**VERIFICATION OF FACTS AND STATEMENTS**

18. Respondent verifies that the facts and statements set forth in this Agreement are true and correct to the best of Respondent's knowledge, information and belief. Respondent understands that statements in this Agreement are made subject to the criminal penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
Michael J. Bennett  
Prosecuting Attorney  
Department of State

  
\_\_\_\_\_  
Bebashi Transition to Hope  
Respondent  
By: Gary J. Bell  
Print  
Title: CEO  
Print

DATE: 19 SEP 2018

DATE: 9/13/18



**IN THE MATTER OF  
Bebashi Transition to Hope  
File No.: 18-98-03649**

**ORDER**

AND NOW, this 26<sup>th</sup> day of September 2018, the foregoing Consent Agreement is hereby approved and the terms set forth herein are hereby adopted and incorporated herein as the Order of the Acting Secretary of the Commonwealth, now issued in resolution of this matter.

**THIS ORDER** shall take effect immediately.

**BY ORDER:**

  
\_\_\_\_\_  
**Robert Torres**  
**Acting Secretary of the Commonwealth**

**For the Commonwealth:**

Michael J. Gennett  
Prosecuting Attorney  
306 North Office Building  
401 North Street  
Harrisburg, PA 17120

**For Respondent:**

Bebashi Transition to Hope  
1235 Spring Garden Street  
Philadelphia, PA 19123

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE

TO: Robert Torres  
Acting Secretary of the Commonwealth

THRU: Martha H. Brown  
Assistant Counsel

FROM: Michael J. Gennett  
Prosecuting Attorney

RE: Consent Agreement: Commonwealth of Pennsylvania, Bureau of Corporations and Charitable Organizations v. Bebashi Transition to Hope; File No.: 18-98-03649

DATE: 19 SEP 2018

Please find enclosed a proposed Consent Agreement and Order for the above referenced matter. The essential facts of this matter are as follows:

Respondent was issued certificate no. 12765.

Respondent was unregistered from May 16, 2016 through September 10, 2018 while soliciting contributions. During this unregistered period, Respondent received approximately \$1,753,214.00 in contributions. Respondent was not exempt from registration under 10 P.S. § 162.6(a)(8) since Respondent received contributions in excess of \$25,000.00 per annum.

Respondent violated Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), by and through 10 P.S. § 162.5(a), by soliciting contributions without the approved registration filed with the Bureau.

**The proposed penalties and other actions are recommended as follows:**

- Respondent is ordered to pay an administrative fine of \$6,000.00.

If you choose to accept the proposed penalties in resolution of this matter, please sign and date the Order page of the Consent Agreement and then return the Consent Agreement and Order to me. Thank you for your attention to this matter.